

Department. Despite [REDACTED] letter and subsequent efforts, Ambassador [REDACTED] was not removed from her posting at that time.

43. After lobbying [REDACTED] to remove [REDACTED] did not on its own succeed, it appears that Parnas soon enlisted Rudolph Giuliani¹⁹ in his efforts to remove [REDACTED]. Based on my review of emails obtained pursuant to the January 18 Warrant and my review of public reporting, I have learned, among other things, the following:

a. Parnas appeared to have met Giuliani at one of the [REDACTED] fundraising events Parnas attended in the spring of 2018. In September 2018, Parnas retained Giuliani, through his consulting firm [REDACTED] LLC, ostensibly to act as a consultant and spokesman for Parnas's fledgling insurance business, Fraud Guarantee. As part of that initial agreement, Giuliani requested a \$500,000 retainer and a total \$900,000 payment, of which at least the retainer appears to have been paid. However, based on my participation in the investigation and my review of materials obtained pursuant to the January 18 Warrant and May 16 Warrant, it appears that Giuliani's work for Parnas involved, in large part, assisting in the efforts to remove Ambassador [REDACTED]

44. It appears that Giuliani's assistance on the Ambassador issue began in earnest in December 2018. Based on my review of public reporting and materials obtained pursuant to the January 18 Warrant and May 16 Warrant, I have learned, among other things, the following:

¹⁹ Based on my review of the January 18 Warrant, I have learned that while Giuliani is an attorney, the parties' contract includes a detailed description of the scope of work to be performed by [REDACTED] none of which was legal in nature. To the contrary, the terms of the contract expressly state that [REDACTED] is being retained "as a consultant" and describes a series of non-legal tasks to be completed in that capacity. Based on my participation in the investigation, aside from his statement that Fruman and Parnas were his "clients," described below, it does not appear that Giuliani was ever representing Fruman or Parnas as an attorney at any point.

- a. On December 7, 2018, Parnas forwarded Giuliani a copy of the May 9, 2018 [REDACTED] letter.
- b. In January 2019, Giuliani and Parnas met with [REDACTED] at [REDACTED] in New York. A memorandum regarding the meeting, which appears to have been subsequently provided to the State Department by Giuliani,²⁰ indicates that they discussed Ambassador [REDACTED], who [REDACTED] asserted “protects” the “ineffective” Specialized Anticorruption Prosecutor’s Office in Ukraine – an apparent reference to NABU and [REDACTED] – and who [REDACTED] claimed asked him to close three cases, including a case against the member of Ukraine’s Parliament who was involved in the disclosure of [REDACTED]-related information. According to the memorandum, [REDACTED] also reported that he had re-initiated an investigation his predecessor, [REDACTED], had opened into [REDACTED], in which [REDACTED] a board member, was implicated.
- c. Around the same time, also according to a memorandum which appears to have been provided to the State Department by Giuliani, Parnas and Giuliani participated in a phone interview of [REDACTED] (the former Prosecutor General), who provided information about his [REDACTED]

²⁰ Based on my participation in the investigation, I have learned that according to a U.S. Department of State Office of Inspector General investigation, in late March or early April 2019, Secretary of State [REDACTED] received a package that had to do with “Ukraine issues.” The package had a return label of “The White House,” although it bore no official seal, and contained notes from interviews between Parnas, Fruman, and Giuliani, among others, with [REDACTED] and [REDACTED] dated January 23, 2019, regarding [REDACTED] and [REDACTED]. The documents were separated into folders that bore the insignia of the Trump Hotel. The notes from the meeting with [REDACTED] include his allegation about the “do not prosecute list,” discussed below, and his explanation that the heads of SAPO and NABU “do not like each other” and that the head of NABU favored [REDACTED] over Trump, and that [REDACTED] spends money on “good public relations” for NABU. The package then contained [REDACTED] March 20, 2019 articles (discussed below) featuring his interview with [REDACTED] along with documents that appeared to be [REDACTED] notes and emails regarding the articles. On October 2, 2019, Giuliani confirmed to [REDACTED] that the package originated with him, and that he gave the documents to the White House, which then passed them to [REDACTED]. Giuliani claimed that [REDACTED] told him that [REDACTED] would refer the documents for an investigation.

investigation and claimed that President [REDACTED] had put an end to the investigation at the request of then-Vice-President [REDACTED]

45. Based on my review of U.S. border crossing records, materials obtained pursuant to the May 16 Warrant, and public reporting, it appears that on February 11, 2019, Parnas and Giuliani again met with [REDACTED] this time in Warsaw, Poland. Based on my review of materials obtained from the May 16 Warrant, I have learned that in February 2019, [REDACTED] [REDACTED] an attorney and the spouse of former Washington D.C. United States Attorney [REDACTED], appears to have become involved in the effort to remove Ambassador [REDACTED]. On multiple occasions, she asked Parnas if Giuliani had completed drafting a retainer agreement, noting in one instance that “[o]ur hands are pretty tied about doing much until we have it in place as we need it for FARA.” Texts messages suggest that Giuliani was preparing a retainer agreement, and Parnas stated in one message that the retainer should be between [REDACTED] and the Ministry of Justice of Ukraine (Attn: [REDACTED])

46. Based on my review of materials obtained from the May 16 Warrant, I have learned that on or about February 16, 2019, Giuliani sent Parnas and Fruman a draft retainer agreement between “[REDACTED] as the General Prosecutor of Ukraine,” and [REDACTED], and [REDACTED].²¹ The retainer amount was \$200,000 for services by Giuliani, [REDACTED], and [REDACTED] in recovering “sums of money in various financial institutions outside Ukraine.” It is not clear what this phrase refers to, and may simply have been an effort to legitimize, or give the

²¹ Based on my review of materials obtained pursuant to the May 16 Warrant, it is not clear whether Parnas or Giuliani forwarded a copy of the February 2019 draft retainer agreement to [REDACTED]. Around that time, [REDACTED] repeatedly asked Parnas what the status of the retainer agreement was, and asked him to forward her a copy: Parnas responded that he was trying but it was not going through, although it is not clear whether Parnas ultimately succeeded in forwarding the draft retainer to [REDACTED]

appearance of legitimacy to, what were in truth their efforts to remove the U.S. ambassador to Ukraine. The agreement also stated that it was a temporary agreement to be superseded “by a long term agreement.” On February 20, 2019, Parnas asked Giuliani to send wire instructions and a “signed copy by you [REDACTED] and [REDACTED] so they can execute and wire funds.” Later that day, Parnas confirmed that he “received signed retainer,” however, we have not obtained a copy of the signed retainer. As discussed below, drafts of three long-form retainer agreements between [REDACTED] [REDACTED] and (i) [REDACTED], (ii) [REDACTED],²² and (iii) [REDACTED] and [REDACTED] separately – all of which were signed by [REDACTED] – were subsequently circulated in April 2019. Based on my review of Department of Justice records related to FARA filings, I have learned that none of Parnas, Fruman, Giuliani, [REDACTED] or [REDACTED] registered under FARA at any point in 2018 or 2019.

47. Based on my review of materials obtained from the May 16 Warrant, I have learned that after Giuliani received payments from Parnas, Giuliani appeared to have privately lobbied high-level officials—including, apparently, Secretary of State [REDACTED] and President Trump—for the removal of Ambassador [REDACTED]. On February 11, 2019, the same day that Giuliani and Parnas met with [REDACTED], [REDACTED] asked Parnas and Giuliani in a text message “Is there absolute commitment for HER to be gone this week?” Giuliani replied, “Yes not su[r]e how absolute [w]ill get a reading in morning and call you. [REDACTED] is now aware of it. Talked to him on Friday.” On February 14, 2019, [REDACTED] asked Parnas if he had heard from Giuliani, and Parnas said he had, and encouraged [REDACTED] to “nudge [Giuliani] about the Mrs. A.,” which appears to be a

²² Based on my review of publicly available material, I have learned that [REDACTED] worked under [REDACTED] at that time as the deputy head of International Legal Cooperation. According to an article published on October 5, 2019 in the [REDACTED] [REDACTED] asked [REDACTED] to remove [REDACTED] at a meeting in 2016 due to [REDACTED]’s corruption.

reference to Ambassador [REDACTED]. On February 16, 2019, Parnas texted [REDACTED] that he “really need[ed] to know [the] status of madam A. [w]hile I’m here.” It appears Parnas was in Ukraine at the time. [REDACTED] responded, “That’s for Rudy to get tonight.” The next day, [REDACTED] asked Parnas if Giuliani “meet with the guy re Amb?” to which Parnas replied, “I am still waiting on that[, m]eeting with big guy in 4 hours,” an apparent reference to President Trump. Later that day, [REDACTED] asked “Was he successful re Amb?” to which Parnas replied “this week.”

48. Based on my review of materials obtained from the May 16 Warrant, public reporting and U.S. border crossing records, I have learned that shortly after Giuliani’s lobbying efforts, Parnas traveled to Ukraine in late February and met with [REDACTED]. On February 21, 2019, Giuliani texted Parnas, “How is it going????” to which Parnas replied, “Meeting with [REDACTED] [REDACTED] now everything good.” Three days later, Giuliani again asked how things were going, and Parnas explained that he was “meeting with [REDACTED] [REDACTED] in 2 hours he has some paperwork to give us I’ll call you after the meeting.” It is currently unclear whether these meetings between Parnas and [REDACTED] regarded [REDACTED] desire to have the Ambassador removed; Giuliani’s desire for information about [REDACTED] and [REDACTED]; or both; or another topic. Nonetheless, as reflected in text messages below, it does appear that Parnas’s efforts to have Ambassador [REDACTED] removed were done at the request of [REDACTED].

49. Based on my review of materials obtained from the May 16 Warrant and public reporting, I have learned that following Parnas’s meeting with [REDACTED] in February 2019, and given that Giuliani’s lobbying efforts appeared to have failed, Parnas, [REDACTED] Giuliani, and [REDACTED] worked with a journalist, [REDACTED] at [REDACTED], to mount an aggressive public media campaign to remove [REDACTED]. Their media campaign began within days of [REDACTED].

complaining to Parnas about actions that [REDACTED] had taken in Ukraine against an ally of [REDACTED]. Specifically, I have learned the following:

50. According to articles published on March 6, 2019, [REDACTED] gave a speech in which she called for [REDACTED]'s removal from SAPO. As discussed above, NABU had previously called for the removal of [REDACTED] (who, according to public reporting, was an ally of [REDACTED] and [REDACTED] and claimed that [REDACTED] had leaked information about corruption cases to corruption targets; yet a year later, [REDACTED] was still in his position.

[REDACTED] also criticized the Ukrainian court system, which she described as riddled with compromised judges.

51. Based on my review of materials obtained pursuant to the May 16 Warrant, I have learned that [REDACTED] immediately complained about [REDACTED] statements to Parnas. Specifically, on March 5, 2019 (which appears to be the day of [REDACTED] speech, which was not reported until the following day), [REDACTED] texted Parnas "Ambassador openly called to fire head of the SAPO," which was a reference to [REDACTED]. Parnas asked [REDACTED] to call him, and [REDACTED] reported that the Ambassador had also criticized Ukrainian Supreme Court judges.

52. Based on my review of materials obtained pursuant to the May 16 Warrant, I have learned that in response to [REDACTED] complaint, on March 8, 2019, Parnas sent [REDACTED] a photograph of [REDACTED]'s letter, and she replied by sending the contact information for [REDACTED] [REDACTED] a reporter at [REDACTED]. That same day, according to text messages, it appears that Parnas, [REDACTED], and [REDACTED] met with [REDACTED] about Ambassador [REDACTED] and the next day Parnas sent [REDACTED] information about the Ambassador. Specifically, I have learned the following:

a. [REDACTED] wrote Parnas again on March 8, 2019, and referred to a statement [REDACTED] made in which she called for [REDACTED]'s removal; Parnas replied "we are all in the loop," and wrote to confirm that they were setting up an interview with [REDACTED] and a journalist [REDACTED] as discussed below). [REDACTED] then sent Parnas the contact info for [REDACTED] and [REDACTED] wrote: "[REDACTED] is waiting I explained everything. Ready to talk about the 1[a]ck of impartiality." Parnas and [REDACTED] discussed setting up an interview between [REDACTED] and [REDACTED], but [REDACTED] told Parnas that [REDACTED] could not answer questions about "the Ambassador [REDACTED] in the "middle of the campaign." Based on my review of public reporting, I have learned that at the time, [REDACTED] was running for re-election, which he would ultimately lose.

b. [REDACTED] appeared to grow impatient with Parnas's failure to secure [REDACTED] removal. On March 11, 2019, [REDACTED] asked Parnas when he would be receiving an invitation from the "General Attorney," which appears to be a reference to the U.S. Attorney General. On March 13, 2019, [REDACTED] wrote Parnas "I am fucking sick of everything. I did not get the visit. My First did not get shit. I am ready to screw your opponents. But you want even more. We – everything. You – later. This is not fair." Based on my participation in the investigation, this appears to be a reference to [REDACTED] and others' willingness to share information about [REDACTED] and [REDACTED] and frustration that Parnas could not similarly deliver on issues to include the removal of Ambassador [REDACTED] and meeting with the Attorney General. On March 14, 2019, Parnas responded "I just spoke with our [people]. I think there is good news. When you get a chance, call me regarding your visit here." Based on my participation in the investigation, it appears that "our people" refers to Giuliani and/or [REDACTED]

c. Parnas, [REDACTED] and [REDACTED] continued to work together to publicize [REDACTED]’s allegations through [REDACTED]. A few days later, on March 12, 2019, Parnas received from [REDACTED] a written narrative and answers to questions posed by [REDACTED] about [REDACTED], Vice-President [REDACTED] and [REDACTED]. Parnas forwarded [REDACTED] answers to [REDACTED]. Around that time, Parnas also spoke to [REDACTED] and conveyed additional information back to [REDACTED]. Parnas indicated that he needed President [REDACTED] and [REDACTED] “on the record about the ambassador and [REDACTED] and so Parnas set up an interview between [REDACTED] and [REDACTED].

d. Based on my review of public reporting, I have learned that on March 20, 2019, a portion of [REDACTED] video interview with [REDACTED] and an accompanying article entitled “Senior Ukrainian Official Says He’s Opened Probe into US Election Interference” were published in [REDACTED]. In his interview, [REDACTED] claimed he would open an investigation into whether the director of NABU, [REDACTED], attempted to “influence the 2016 vote to the benefit of Democratic presidential nominee [REDACTED].” In a second video interview published on March 20, 2019, by [REDACTED] in [REDACTED], [REDACTED] told [REDACTED] that Ambassador [REDACTED] had given him “a list of people whom we should not prosecute” during their first in-person meeting in or about January 2017. [REDACTED] reported that [REDACTED] was not “the only person complaining about the U.S. Embassy in Kiev,” and noted that Congressman [REDACTED] wrote a “private letter asking Secretary of State [REDACTED] to recall the current U.S. ambassador, alleging that she made disparaging statements about President Trump.” [REDACTED] also posted a copy of the letter. The article quoted [REDACTED] as describing [REDACTED] allegations as untrue and an “absurd attempt” to discredit NABU.

53. Based on my review of materials obtained from the May 16 Warrant and public reporting, I have learned that Parnas continued working to publicize [REDACTED]’s allegations against

[REDACTED] and texted links to [REDACTED] articles to many of his contacts. Specifically, I have learned the following:

a. On March 20, 2019, Parnas sent [REDACTED] the development director of [REDACTED] PAC (to whom Parnas had previously donated in the name of GEP) links to both of [REDACTED] articles in [REDACTED], along with links to tweets by [REDACTED] and [REDACTED]. Parnas instructed [REDACTED] “have [REDACTED] retweet it,” an apparent reference to [REDACTED] confirmed “sent.” As discussed below, [REDACTED] retweeted a related article several days later. However, President Trump retweeted one of the links that Parnas sent to [REDACTED] that same day, on March 20, 2019: an article entitled “As Russia Collusion fades, Ukrainian plot to help [REDACTED] emerges.” [REDACTED] then sent a copy of President Trump’s tweet to Parnas.

b. Parnas frequently updated [REDACTED] on the success of their March 20, 2019 press blitz. Parnas promptly sent a screenshot of President Trump’s tweet to [REDACTED]. In an apparent effort to garner more information for [REDACTED], Parnas asked [REDACTED] to send him “the names of the people that she said,” which appears to be a reference to [REDACTED]. [REDACTED] claimed “do not prosecute list.” [REDACTED] sent Parnas three names (“[REDACTED] MP, [REDACTED], MP, [REDACTED], ngo”) and described them all as “loud NABU activist[s].” As discussed above, based on public reporting, it appears that [REDACTED] may have clashed with [REDACTED] regarding NABU in the spring of 2018, and was frustrated by her continued alignment with NABU, which appears to have provided a motive for [REDACTED] to claim that [REDACTED] had asked him not to prosecute “loud NABU activist[s].” Parnas congratulated [REDACTED] and told him that “Today you become a world-class political figure. Glory to the Ukraine !!!” [REDACTED] then asked Parnas if it was “true, that the Ambassador chick and [REDACTED] [sic] were called to Washington,” which appears to be a reference to [REDACTED] and [REDACTED], the head of NABU, to which Parnas replied, “I will call later. We’ll

talk.” Parnas then reported to [REDACTED] that President Trump had re-tweeted a story about [REDACTED] [REDACTED] responded, “If I am not going to get invited for an official visit in the nearest future, I will not be able to fight off our or your [people].” Based on my participation in the investigation, it appears that [REDACTED]’s reference to fighting off “our or your [people]” referred to their perceived enemies in Ukraine and the U.S., respectively.

c. The day after [REDACTED] published the [REDACTED] interview, on March 21, 2019, Parnas complained to [REDACTED] and [REDACTED] that the top news story in Ukraine was the reporting regarding Ambassador [REDACTED], which prompted the Ambassador to put out a statement saying that [REDACTED] was a “prime example of corruption.” [REDACTED] was upset about that statement, and the news coverage he was receiving in Ukraine. He complained to Parnas, “why the fuck do I need these kinds of adventures . . . 10 days before the election” in Ukraine. “Moreover,” [REDACTED] continued, “they are saying in the State Department that my reports work in favor of corrupt officials. Great fucking help to Ukraine.” Parnas responded that he would call [REDACTED] and had “good news.” Then, in an apparent effort to quell the negative press [REDACTED] was receiving and further publicize their allegations against [REDACTED], Parnas offered to [REDACTED] and [REDACTED], “You want me to go on [REDACTED] news and talk about it? I would not mention any names if I did that. I would just say a client approached me six months back with allegations that FBI and US Ambassador in Ukraine were playing favorites. And reference [REDACTED] getting free pass and alleged ties to ‘high level [REDACTED] administration officials’. Maybe mention allegations about setting up [REDACTED]. The media could connect the dots from there.” Based on my participation in the investigation and my review of materials obtained pursuant to the May 16 Warrant, Parnas’s reference to his “client” appears to refer to [REDACTED]

d. Based on my review of public reporting, I have learned that [REDACTED] article soon received substantially increased press attention. On March 23, 2019, on the [REDACTED] on [REDACTED], [REDACTED] aired a segment highlighting that former-Congressman [REDACTED] sent Secretary of State [REDACTED] “an urgent letter” in May 2018, asking that Ambassador [REDACTED] be removed from her position, and published a copy of that letter. [REDACTED] was a guest on the program, and announced: “I have learned this evening that the President has ordered her dismissal from her post. . . as a result of her activities there which were complained of by Congressman [REDACTED]. She is known and reported by people there to have bad-mouthing the President of the United States Donald Trump, to have told Ukrainians not to listen to him or obey his policy . . . and finally her activities have caught up with her.” Based on my review of materials obtained pursuant to the May 16 Warrant, it appears that the fact that Trump had decided, at least at that point, to fire [REDACTED] appears to be the “good news” that Parnas reported back to [REDACTED] two days prior.

e. In an apparent reference to [REDACTED] interview, Parnas happily wrote to [REDACTED] “I love you and your husband you are the best,” and “Tell [REDACTED] he was awesome my hero.” [REDACTED] responded, “We can be really great if we have a retainer signed.” Parnas agreed, and [REDACTED] asked if the “Wicket Witch” was gone, which appears to be a reference to [REDACTED]

f. On March 23, 2019, Correia texted Parnas: [REDACTED] must be pretty happy!! And grateful?!” Based on my review of materials obtained pursuant to the January 18 Warrant and May 16 Warrant, I believe that Correia’s statement appears to be a reference to the possibility that

Congressman [REDACTED] would replace [REDACTED].²³ Correia then wrote, "This is insane! Finally the facts come out, [REDACTED] etc., and, looks like she's finally fired . . . This is even better than if it happened before." Parnas replied, "Just the beginning."

g. Around this time, [REDACTED] and Giuliani began frequently posting messages related to Ukraine, [REDACTED], [REDACTED], and the 2016 election on Twitter, apparently in an effort to further magnify the press attention their claims against [REDACTED] would receive.

h. On March 24, 2019, [REDACTED] retweeted an article summarizing [REDACTED] reporting in the [REDACTED], entitled "Calls Grow to Remove [REDACTED]'s U.S. Ambassador to Ukraine."

i. Although Parnas, Giuliani, and [REDACTED] appeared to be pleased with the press response in the U.S., the press response in Ukraine appeared to be unfavorable to [REDACTED]. On March 26, 2019, [REDACTED] sent Parnas pictures of documents that allegedly contained information about [REDACTED], and noted, "I hope this is enough." He then complained to Parnas that despite the information he was gathering about [REDACTED] the Ambassador had not been fired. In particular, he wrote the " [REDACTED] is attacking me already . . . Zero results. They want to listen to the tape. I will get the recording device tomorrow and the testimony of the participants of the

²³ Based on my review of the materials obtained pursuant to the January 18 and May 16 Warrants, it appears that Parnas and Correia had discussed replacing [REDACTED] with [REDACTED] at least as early as January 2019. On January 7, 2019, Correia sent Parnas a document entitled "Discussion List," which had a section labeled "Ukraine," which referenced their efforts to remove [REDACTED]. Specifically, Correia noted that the "former Inspector General," which appears to be a reference to [REDACTED], was waiting on a visa, and that they would "need help if denied." The existing inspector general, which appears to be a reference to [REDACTED] was "coming January 10-15th." With respect to "Ambassador to Ukraine," Correia wrote "Replace with [REDACTED] and noted that they "[s]hould be receiving very important info by both [REDACTED] and [REDACTED] including information regarding "payoffs and bribes," an "Anti-Trump" room in the embassy, and "Telling current President (and others) that Trump will be impeached." Correia also noted that "We will be returning January 20th, or thereabouts," which appeared to be a reference to Parnas returning to Ukraine.

conversation. My case on [a Ukrainian public figure who allegedly helped [REDACTED]] is proceeding along in force. Testimony about [REDACTED] [likely [REDACTED]] monetary transfer is available. And only you are unable to bring down a single, stupid woman ☺.” Parnas wrote back, “She is not a simple, stupid woman. Believe me. But she is not going anywhere.”

j. On March 29, 2019, Parnas wrote to [REDACTED] “I was asked to tell you personally that America supports you and will not let you get hurt. It does not matter how it looks now. Everything will soon change and everything will go in the right direction. So that you would know, that you are being talked about here as a true hero of the Ukraine.” [REDACTED] then told Parnas that he had additional documents related to [REDACTED], and when Parnas asked [REDACTED] to send them to him, [REDACTED] replied that he would “pass it along with the new Ambassador ☺.”

k. Over the next several days, Parnas continued to feed information to [REDACTED] who asked Parnas to “eyeball” articles for “accuracy,” and continued to publish articles in [REDACTED]. On March 27, 2019, Parnas told Giuliani that “[REDACTED] just canceled on [REDACTED] which prompted Giuliani to say that “[t]hey are scared[,] I will buck them up.” Three days later, on March 30, 2019, Giuliani confirmed that he would be appearing on [REDACTED] that morning, to which Parnas responded, “Great.” Parnas sent some of [REDACTED] articles to Giuliani, among many other contacts.

l. However, when [REDACTED] still had not been removed, [REDACTED] continued his complaints about [REDACTED] to Parnas. On March 29, 2019, [REDACTED] told Parnas that the “ambassador chick organized leak of NABU materials to the TV project financed by you about corruption of those surrounding [REDACTED]. Next one is going to be about me.” Parnas replied, “I will call you soon with the news.” On April 2, 2019, [REDACTED] bragged, “I am probably the most famous Ukrainian where you are,” to which Parnas replied, “This is going to be a big week.”

On April 9, 2019, [REDACTED] provided the names of “Advisors and public speakers of the presidential candidate” [REDACTED], who was running against [REDACTED], and their alleged connections to [REDACTED] (to whom [REDACTED] referred by her nickname, “[REDACTED]”), and wrote that the candidate for Prosecutor-General—who would replace [REDACTED] in the event [REDACTED] was elected—was a “Favorite activist of [REDACTED].”

54. Based on my review of materials obtained from the May 16 Warrant and public reporting, I have learned that Parnas, [REDACTED] and Giuliani made efforts to formalize the relationship with [REDACTED] in April 2019. On April 13, 2019, Giuliani sent Parnas a retainer agreement between [REDACTED] and [REDACTED] and [REDACTED] and his deputy. The agreement indicated that [REDACTED] was retaining [REDACTED] to represent him “in connection with recovery and return to the Ukraine government of funds illegally embezzled from that country and providing assistance to meet and discuss with United States government officials the evidence of illegal conduct in Ukraine regarding the United States, for example, interference in the 2016 U.S. elections.”²⁴ The agreement also noted that the firm’s services “may entail activities subject to mandatory public disclosure under . . . the Foreign Agent Registration Act[, which] . . . requires the Firm to register and report certain activities on behalf of foreign political parties or entities.” Per the agreement, [REDACTED] would pay a \$125,000 retainer and \$25,000 per month, plus costs. Based on my review of materials obtained pursuant to the May 16 Warrant, it appears that [REDACTED] subsequently signed a copy of the retainer agreement.

²⁴ Based on my participation in the investigation, I believe that “embezzlement of funds” may be a reference to an allegation that [REDACTED] misappropriated money from Ukraine or [REDACTED]. “Interference in the 2016 U.S. election” may be a reference to the allegation that there was a plot to turn up information about then-candidate Trump and individuals working with him, including [REDACTED].

55. Based on my review of materials obtained from the May 16 Warrant and public reporting, I have learned that between April 11 and 23, 2019, Parnas worked with [REDACTED] to arrange additional interviews with Ukrainian government officials, and provided the questions that [REDACTED] would ask one official. Specifically, I have learned, among other things, the following:

a. [REDACTED] ran multiple articles during that period. However, [REDACTED] walked back some of his claims and told [REDACTED] on April 17, 2019, that Ambassador [REDACTED] had never requested a “do not prosecute” list, and it was instead he who had requested that list. In addition, on April 21, 2019, [REDACTED] won the Ukrainian presidential runoff against [REDACTED]. Based on my participation in the investigation and my review of materials obtained pursuant to the May 16 Warrant and public reporting, I believe that [REDACTED] may have walked back his comments due to the negative press attention his unfounded allegations had garnered, or in an effort to maintain credibility with the incoming [REDACTED] administration, so that he would not be removed by any incoming administration.

b. On April 23, 2019, Parnas asked Giuliani to “text me or call me if you have any news,” and Giuliani responded, “He fired her again.” Parnas wrote, “I pray it happens this time I’ll call you tomorrow.” But on May 4, 2019, Giuliani joked, “Boy I’m so powerful I can intimidate the entire Ukrainian government. Please don’t tell anyone I can’t get the crooked Ambassador fired or I did three times and she’s still there.” That same day, [REDACTED] told Parnas that “People here are talking that there will be a very high level coming from you to the inauguration,” to which Parnas replied “You do understand Who is dealing with this.” Two days